

Session #6

Rules, Roles, and Responsibilities in Transportation Planning and Air Quality:

One State's View

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ABSTRACT

The Clean Air Act Amendments (CAAA) of 1990 and the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 are a pivotal moment in transportation planning in the United States. In 1997 the U.S. Environmental Protection Agency revised both the ozone standard and the small particulate matter standard to be more stringent. In 1998 congress is poised to reauthorize the ISTEA. The paper is written from the point of view of North Carolina which operates and maintains the largest state maintained highway system in the United States. North Carolina also has seven counties classified as maintenance for one or more criteria pollutants. The new ozone standard impacts North Carolina more heavily than any state, other than Ohio.

This paper examines the changes in transportation planning since 1990 and examines potential effects of recent changes to the ozone and fine particulate matter standard and what effect they might have on transportation planning. After discussing these issues the paper then presents a number of actions and strategies to allow States and MPOs to effectively deal with the new regulations. These strategies are based on experience in North Carolina since 1990.

Rules Roles and Responsibilities for Transportation Planning Air Quality: One State's View

The Operating Environment of State and Local Transportation Agencies has changed dramatically since 1990. These changes resulted from passage of the [Clean Air Act Amendments](#) of 1990 (CAAA90) and the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA). Transportation Planning is on the brink of more changes that will be as extensive as those that have taken place since 1990. By drawing on recent events this paper attempts to extrapolate from current events to the future and to develop some strategies for small and medium sized urban areas to utilize in coping with the new ozone standard and the new fine particulate matter standard.

The Rules: Setting the Stage

The Clean Air Act Amendments of 1990 and the Intermodal Surface Transportation Efficiency Act of 1991 reshaped the environment of transportation planning in the 1990's.

The CAAA90 was a landmark in environmental legislation. A number of its provisions directly or indirectly affected transportation planning. One goal of [CAAA90](#) was to ensure that transportation planners and Air quality planners worked together to meet health and mobility goals in nonattainment and maintenance areas. ISTEA was the first post Interstate highway transportation legislation. ISTEA reflects the belief that in many areas the transportation infrastructure is either fully in place or nearly so. ISTEA reflected this belief and placed emphasis on system connectivity, system completion, and financial flexibility between major funding categories. ISTEA also strengthened the relationship between transportation planning and Air quality planning.

The Clean Air Act Amendments of 1990

Several provisions of the CAAA90 directly or indirectly effect transportation planning. The three most important of these provisions were: classification of nonattainment areas, the requirement for 15% reduction in volatile organic compounds (VOCs) by 1996, and the conformity provision.

Congress realized that not all [nonattainment areas](#) had air quality problems of the same severity and that areas with more severe nonattainment problems required longer lead time to implement the controls needed to meet the standards. This led directly to the development of a multi-tier classification system with the severity of the problem ranging from marginal to moderate to serious to severe to extreme for ozone and from moderate to serious to severe for carbon monoxide. Deadlines ranged from 1993 for marginal ozone areas to 2020 for extreme ozone nonattainment areas.¹

In light of the then current air quality control regime focusing on volatile organic compounds congress placed a requirement on all moderate and above ozone

¹The Los Angeles area is the only area classified as extreme for ozone.

nonattainment areas to reduce emissions of VOCs by 15% between 1990 and 1996. This requirement specifically excluded emissions reductions resulting from the federal motor vehicle control program. A [special state implementation plan \(SIP\)](#), detailing the control VOC reduction control strategies, was to have been submitted by 1996.

Section 176(c) of the Clean Air Act, transportation conformity, was significantly strengthened in the CAAA90. Originally conformity had existed to ensure that any transportation control measures included in the state implementation plan were also included in transportation planning and transportation programming. Conformity was revised to require that agencies using federal funds could only implement projects consistent with the SIP in nonattainment or maintenance areas. The practical implications of this change only become evident when considered in the context of the regulations resulting from it. Metropolitan Planning Organizations are given the responsibility of determining whether or not transportation plans, programs, and projects conform to the intent of the SIP. To make a positive conformity finding the following things must be true:

- (1) The MPO has used the latest planning assumptions,
- (2) The MPO used the most recent emissions model in its analysis,
- (3) The MPO has consulted with other agencies in an agreed upon manner,
- (4) Any transportation control measures included in the SIP are being implemented on schedule,
- (5) Estimated emissions from the transportation system are less than or equal to the emissions anticipated in the SIP.

If the MPO cannot make one or more of these statements it cannot make a conformity determination. If an MPO cannot make a conformity determination only two strictly limited classes of projects (previously conforming and exempt) may proceed. The MPO must make a conformity determination on its transportation plan at least every three years or every time the transportation plan is amended. A conformity determination and USDOT conformity finding is also required upon adoption or amendment of a local transportation improvement program and before a NEPA document is completed on a transportation project.

The conformity determination for the transportation plan also must cover the full twenty year design period of the fiscally constrained transportation plan while an attainment SIP or Air quality maintenance plan is only required to cover a ten year period. This SIP/Long Range Plan (LRP) mismatch causes significant problems because the LRP often includes ten or more years of population and employment growth not considered in developing the SIP. The motor vehicle emissions budgets in the SIP remain effective for the full twenty years of the transportation plan; however, additional emissions reductions or controls on motor vehicles only come from improving vehicles or improved travel efficiency. Additionally the MOBILE emissions model currently does not consider vehicle improvements beyond 2020. In order to comply with the federal requirement for 20 year transportation plans many MPOs are making population and employment projections to

2025.

The Intermodal Surface Transportation Efficiency Act

ISTEA also played a major role in shaping transportation planning in the 1990's. ISTEA shifted the balance of power between modes of transportation and between states and metropolitan planning organizations. ISTEA also began the shift from completing the interstate highway system to maintaining and managing the existing transportation infrastructure.

The 3-C (cooperative, comprehensive, and continuing) planning process has long been the cornerstone of urban transportation planning. ISTEA strengthened the requirements of the 3-C process and changed the dynamics of the relationship between metropolitan planning organizations and state transportation agencies. More responsibility and power were given to the MPOs. However, without adequate staffing or agreement with the state transportation agency this authority was difficult to exercise. Few small MPOs had the staff or budget needed to meet the planning requirements. Perhaps the four most important changes were: 1) imposition of fiscal constraint on long range transportation plans and local transportation improvement programs, 2) imposition of a mandatory 20 year design horizon for LRPs, 3) imposition of mandatory three or five year reviews of the LRP, and 4) a direct tie to section 176(c) of CAAA90. In addition to these items the metropolitan planning regulations developed from ISTEA required a substantial investment in public involvement procedures intended to solicit input from traditionally under served groups. ISTEA also required explicit consideration of 16 planning items.

Where are we and how did we get here?

In 1990 North Carolina had seven counties newly classified as nonattainment for one or more pollutants. However, the transportation planning community had little or no relevant experience dealing with either state air quality implementation plan development or with conformity. Transportation related air quality analysis of transportation projects consisted mostly of the carbon monoxide (CO) hot spot analysis required in the NEPA process. By 1998 all seven of North Carolina's nonattainment areas had been redesignated as maintenance for all pollutants. We also had a well developed but under-documented interagency consultation process. We are also suffering the effects of our earlier inexperience and inattention to Air quality related issues. The transportation planning community had been working almost continuously on conformity issues in the seven maintenance areas to the detriment of good transportation planning.

There are a number of things that we, in North Carolina, have done well since 1990. All of our nonattainment areas are now maintenance areas. We have a regular, routine, and growing interagency consultation process. This process is building bridges between agencies and bringing issues to light. We are also participating in policy debates as fully as time and staff permit. We routinely educate our staffs and our decision makers on air quality issues.

There are also a number of things that we need to do better. In our haste to get out from

under the pall of nonattainment we and the State Air agency excluded the MPOs from realistic input into the SIP process. We have had a number of conformity lapses. Most have resulted from administrative problems. However, Charlotte's lapse is real, has lasted for over a year, and may continue for quite some time.

Charlotte's conformity lapse is related to our earlier inexperience with Air quality issues and the effects of the mismatch between the time frames of the SIP and the Long Range Transportation Plan. On December 15, 1994 North Carolina's Department of Environment and Natural Resources submitted an ozone maintenance demonstration for the Gaston-Mecklenburg ozone nonattainment area. That submission contained initial highway mobile source emissions budgets substantially higher than the highway mobile source emissions budgets submitted to USEPA on May 23 1995 and approved July 5, 1995. The change in emissions budgets resulted from NCDENR's desire to correct an error in the method they had used to estimate vehicle miles of travel in the earlier submission. We have been unable to effectively engage USEPA in our consultation process. Also our relationships with our FHWA and FTA regional offices have been poor for several years. At the same time, we and our MPOs are also struggling with our new, more equal, relationships.

The Revised Ozone Standard, the New Particulate Matter Standard, and TEA-21

The transportation planning community was not effectively engaged in the environmental changes that took place in the early 1990's. Recently a number of events have taken place that may cause even more changes in our work environment. East of the Mississippi the ozone transport assessment group (OTAG) has completed its work and EPA has issued a SIP call requiring NO_x reductions for member states based on the modeling done for OTAG. In 1997 President Clinton issued a presidential directive on new ozone and particulate matter standards. Finally Congress has just completed a new transportation bill entitled The Transportation Equity Act for the 21st Century (TEA-21). Each of these events will have some effect on transportation planning.

Regional Ozone Transport

The ozone transport assessment group (OTAG) was created as a response to assertions by states in the northeast that they could not meet the one-hour ozone standard because of transport into their areas from the Midwest and southeast. A total of 37 States and the District of Columbia participated in the OTAG modeling effort. The result of the OTAG process is a requirement for an average 22% reduction in NO_x from the 22 upwind states².

Generally, mobile source emissions are not a significant part of regional transport. However, state Air agencies have discretion as to which NO_x controls to implement. In

²Alabama, Connecticut, District of Columbia, Delaware, Georgia, Illinois, Indiana, Kentucky, Massachusetts, Maryland, Michigan, Missouri, North Carolina, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Virginia, Wisconsin, and West Virginia.

the past emissions control strategy has often meant that Air agencies depended upon emissions reductions provided by the federal motor vehicle control program rather than seeking new stationary source emission reductions. State and local transportation agencies, especially those in the East, must monitor this issue and participate in SIP development. Failure to monitor the OTAG SIP process may result in unanticipated and perhaps unrealistic measures to control transportation related emissions and unforeseen future problems.

The New Ozone Standard

USEPA began the process of revising the ozone standard in response to a lawsuit by the American Lung Association and others to force a reevaluation of the ozone standard based on new scientific data. Ultimately the debate over the new standard was resolved by President Clinton's July 16, 1997 Presidential directive on the new ozone and particulate matter standards³. The result was to develop an ozone standard based on the 8-hour average ozone value for a day. The standard is set at the fourth highest day of the year with a value of 0.08 parts per million. The design value will be taken as the fourth highest day during a three year period. The new ozone standard will affect between 250 and 350 counties nationwide. We can expect the number of people living in nonattainment areas in the United States to increase from approximately 75 million to approximately 120 million.

USEPA is required to begin designations under the new ozone standard by 2000. The designations will be based on three years of data. After areas are designated as nonattainment they have until 2003 to submit SIPs demonstrating attainment.

Transitional Status

A significant innovation created by the new ozone standard is the transitional ozone area. Under some fairly broad guidelines a state can opt to declare its anticipated ozone nonattainment areas as transitional and submit SIPs for those areas before 2000. In exchange for providing early emissions reductions transitional areas conformity and new source review rules will be relaxed and simplified in transitional areas. However, these rules will not be complete until mid to late 1999 and SIPs for transitional areas will need to be approved by December 2000.

Transportation Conformity in Rural Areas

Conformity is coming for rural areas. The concept of nonattainment areas as being congruent with political jurisdictions is slowly eroding. Gradually this concept is being replaced by the concept of an area of violation and area of influence. An area of violation is an area in which a violation of the standard occurs. The area of influence is the area who's sources contribute to the violation of the standard. While the area of influence concept was not implemented in discussions of the new ozone standard the standard itself will bring nonattainment, and conformity, to a new class of area: the rural nonattainment

³Three States (Michigan, Ohio, and West Virginia) are suing USEPA over implementation of the new standards because the Clean Air Scientific Advisory Committee (CASAC) was split in its recommendation for a new ozone standard.

area. EPA's preliminary data for North Carolina shows approximately 20 counties that could be classified as nonattainment for ozone under the new standard. Of these 20 counties approximately half contain no major urban area. These areas pose a significant dilemma for transportation and Air quality planners. As yet no one has addressed the following issues: who is the responsible state or local authority, who performs the conformity analysis, what tools and methods will be used for conformity, and just what does conformity mean in a rural area.

Who is the responsible state or local authority?

In the past, Air quality problems were limited primarily to urban areas with populations greater than 50,000 and well established transportation planning processes. These processes were run under the umbrella of the MPO and the MPO policy board was given the responsibility for making the conformity determination with a USDOT concurrence required to ensure that all the requirements were met in a reasonable fashion. No similar process exists for rural areas. Because counties in North Carolina have no responsibility for providing transportation services this responsibility likely will fall to the Board of Transportation unless some new entity is required either by TEA-21 or by the revision of the conformity regulation necessitated by the creation of rural nonattainment areas. However, other states with county transportation departments will have to come to terms with this issue.

A new requirement in TEA-21 is that of a statewide transportation plan with a twenty year planning horizon. While the regulation for the statewide transportation plan has yet to be written it is likely that USDOT would require that the statewide transportation plan be fiscally constrained while USEPA will likely require that this plan be the basis for transportation conformity in rural areas⁴.

What tools and methods will be used to prove conformity in rural areas?

The transportation activity side of conformity relies on the four step travel demand modeling process for the basis of its analytical rigor. While travel demand models work reasonably well for urban areas they may not work at all well, or be appropriate for rural areas. Their quality is secondary to the fact that most rural counties have neither a transportation planning process nor a travel demand model. USEPA and USDOT are looking at some alternatives in their proposal for transitional ozone areas. However, it is not certain that the benefits of becoming a transitional nonattainment area outweigh the risks associated in declaring oneself nonattainment earlier than necessary.

What does conformity mean in a rural area?

The concept of conformity in a rural area has to be defined. The current understanding of conformity is that in urban areas there is some trade-off between transportation modes. Conformity also assumes there is a direct relationship between mobile source emissions and violations of the NAAQS. These assumed relationships may or may not exist outside

⁴Staff Paper for Transportation Conformity in Transitional Ozone Areas. USEPA July 28

of urban areas.

The New Particulate Matter Standard

At the same time as the ozone standard was revised the particulate matter standard was changed in two ways. First, the PM₁₀ standard was relaxed. Second, a new PM_{2.5} standard was promulgated. The PM_{2.5} standard is set at the lesser of a daily average of micrograms per cubic meter per year or a one-day maximum of 65 micrograms per cubic meter. USEPA will not begin designating PM_{2.5} nonattainment areas until after a national PM_{2.5} monitoring network is in place. This network is scheduled for completion by 2002. EPA will make PM_{2.5} designations between 2002 and 2005 with PM SIPS due by 2008.

Fine particulate matter has traditionally been a problem in the West rather than the east. However, development of the new fine particulate matter standard of 2.5 microns may change that assessment. PM₁₀, the fine particulate matter benchmark, is often a product of incomplete combustion, or of mechanical action, or the re-entrainment of fine dust into the atmosphere. PM_{2.5}, the new standard, represents a particle smaller than a red blood cell. These particles are not the product of mechanical action but are aerosols formed by chemical combination. Little information on speciation or source apportionment is available for PM_{2.5}.

Until the PM_{2.5} standard was promulgated in 1997 there was not a reliable reference monitoring method. The primary tool for estimating mobile source emissions of fine particulate matter is similar to the MOBILE series of emissions models. This model considers primarily the effects of diesel engines and re-entrained dust. Further, we do not really know the composition of PM_{2.5}. Before state Air agencies can effectively develop emissions inventories and control strategies they will need to develop an understanding of what the components of PM_{2.5} are and where they come from.

TEA-21

The Transportation Equity Act for the 21st Century will bring a new series of regulations to replace existing regulations. While the authorization ceiling is much higher, the emphasis is shifting from completing the transportation system to managing the system in place.

Global Warming

The federal and state environmental agencies, and the environmental groups are looking beyond ozone and fine particulate matter to global warming. The Kyoto Conference of 1997 and the United Nations Report on global warming have given them a map to their next issue. The key provision of the Kyoto Treaty is to stabilize greenhouse emissions at or below 1990. While the United States Senate may not ratify the Kyoto Treaty there will be considerable pressure to implement its provisions. Transportation is a major user of energy. In North Carolina approximately 28 percent of greenhouse gases come from

the transportation sector⁵. Furthermore greenhouse gases are products of clean combustion as opposed to “traditional” pollutants that are caused by incomplete combustion. As a major use of fossil fuels the transportation sector will be asked to reduce its fuel use and emissions.

Strategies

Early in the 1990's the transportation planning community was caught napping by the Clean Air Act Amendments and by the Intermodal Surface Transportation Efficiency Act.

We have been reacting to events ever since. Few areas have successfully integrated conformity and Air quality planning into transportation planning. We must do better in the future. We cannot react to events. We must anticipate events and act proactively. The following strategies are intended to allow us to be proactive. Table 1 provides an example of useful methods and the strategies to which they apply.

Educate

Transportation professionals must educate several groups. In no particular order we must: educate ourselves, our decision makers, environmental agencies, and the public.

Transportation planners need to become conversant with new aspects of public policy. It is not enough to understand the thirtieth highest hour, or the K and D factors, or how the funding process works, or the percentage of people that will use a new high occupant vehicle lane. How do these things effect air quality? How does the state Air agency put together the state implementation plan? What is the technical and scientific basis for Air quality standards, problems, and proposed solutions? When and who is going to be sitting at the table when new nonattainment areas are designated? Are you or your MPOs getting realistic input into the SIP development process? Are the MPOs taking the opportunity to provide input? Do they know something that you do not? It is a mistake for state agencies to cooperate amongst themselves to the exclusion of the MPOs.

Most decision makers are poorly prepared to deal with Air quality issues. Yet these are the same people who will be required to assess the information provided by technical staff and make a conformity determination. The environment is important to them; however, the mobility needs of the public are also important to them. They will look to transportation planners to provide reliable information on the issues. Air quality is so complex that more than one exposure is needed to assure understanding.

State Air agencies must also be educated. State Air agencies are primarily interested in maintaining public health by protecting Air quality. Transportation agencies are primarily concerned with maintaining the public's mobility and the economic vitality of the area. While Air quality planners may be engineers they are generally unaware of the limitations of transportation data or the political process of transportation planning. Even simple

⁵*The North Carolina Greenhouse Gas Emissions Inventory for 1990*. Department of Geography and Planning Appalachian State University, Boone North Carolina. August 1996.

terms may have different meanings in the transportation planning context and the Air quality planning context. For example transportation planners tend to think of speed as either spot speed or corridor level speed while Air quality planners are concerned with average trip speed. Without defining terms communication is doomed to failure.

One tactic that we have found useful is for the State transportation agency and the State Air agency to develop a joint presentation explaining Air quality for the public and decision makers.

Research

We simply need to know more. USDOT's strategic goals statement for Air quality lists research as a need. One goal of the Clean Air Act Amendments of 1990 and the ISTEA was to force improved technology. The requirement to assess the Air quality effects of every project in the transportation plan is beyond the scope of most travel models and the EPA MOBILE emissions model used today. We need methods to assess the effects of transportation control measures, system operational improvements, and other projects that have been within the error ("") of the models. We need to develop methods to better quantify the effects of travel demand measures. We need tools to model NO_x emissions. We need to improve the linkage between travel demand models, emissions models, and atmospheric dispersion models. We need significant amounts of research to determine transportation's share of PM_{2.5}.

Monitor

It is critical that transport agencies, at all levels, expend the effort to monitor Air quality related events. While this appears paranoid no other group will protect mobility interests. Activities performed by others have direct, and lasting, effect on our ability to meet the mobility and quality of travel needs of the public. The state Air agency develops emissions budgets apportioned to source categories. Ultimately these emissions budgets determine the activity levels of both stationary and mobile sources, and the stringency of controls placed on the source categories. The natural tendency of a state Air agency is to bank the emissions reductions that have traditionally come from mobile sources and not tackle new controls for significant existing and new stationary sources. The level of the emissions budgets and the stringency of controls ultimately determines the MPO's ability to make conformity.

Communicate

Communication is critical in making the conformity process work. The entire purpose of the interagency consultation process is to foster communications. It is important to develop both formal and informal channels of communications. Formal communications are needed to insure adequate information flow to reach decisions. Informal channels can build understanding and trust between agencies. Both aspects are needed. There are several distinct communities each of which has a distinct language and culture. The purpose of communications is to allow information to pass easily across the boundaries of these groups.

In North Carolina we have had reasonable success with our communications process by having face-to-face meetings on a regular basis. All MPOs with Air quality problems are invited, NCDOT staff, Division of Air Quality staff, FHWA Division Staff, and occasionally environmental organization staff attend. EPA staff, FHWA and FTA region staff and distant MPOs are encouraged to attend electronically. Meeting notes and a list of attendees are distributed to almost fifty people. Using this model, we are integrating our MPOs into to process of developing the interagency consultation process and conformity SIP.

With each other

Perhaps the most neglected aspect of communications is communicating with one another. Each of us knows what goes on in our own states or MPOs. However, most of us do not know much about what goes on in other states or in nearby MPOs. For example events in Atlanta significantly affect transportation planning and conformity throughout the southeast, and to a lesser extent throughout the nation. Yet few professionals outside Georgia have a clear understanding of the events that have transpired during their conformity lapse, or of the agreements affecting us that have been made to resolve Atlanta's conformity lapse and the dispute over previously conforming projects. For example, as a result of Atlanta's conformity lapse USDOT and USEPA intend to develop a memorandum of agreement on how to handle conformity lapses (including previously conforming projects and exempt projects). Such an agreement will probably give more control of the transportation planning process to USEPA .

With federal agencies

Communicating with federal agencies is very important but can be difficult. It is important because federal agencies have the responsibility to comment on and approve conformity findings. It is difficult because federal agencies are often located at some distance from events and do not have the same perspective or knowledge of events as state and local officials. Good relations and communications with one level of the agency does not guarantee good communications with other levels of the same agency. The diversity of federal agencies demands innovative techniques. It is important in some cases to approach upper levels management. Other times it is important to include people in meetings, even if only electronically. Because of limited travel budgets we have found federal agencies are comfortable with this concept.

With Air agencies

State and local Air agencies are our partners and counterparts in the transportation planning Air quality planning process. We must talk with them. Developing both formal and informal channels of communications is very important.

Table 1: Tools for Implementing Proactive Strategies

Tool	Applicable Strategy			
	Educate	Research	Monitor	Communicate
Telephone Trees	X			X
Internet Sites	X	X	X	X
Regular Meetings	X		X	X
Conference Calls			X	X
Written Procedures	X			X
Speakers Bureaus	X			X

With the public

Some consider communications with the public obligatory nuisance. However, the public is our ultimate customer. We need to provide them with as much information as possible so that they can understand the issue, and participate in the planning process.

Input Points

As noted earlier it is important to communicate with a number of groups in the air quality and transportation planning process. In order to effectively communicate transportation agencies also need to know when to voice opinions, concerns, and suggestions. This section discusses a number of places during the process at which transportation agencies should provide input.

USEPA is developing the conformity rule for transitional areas now. It is important that transportation agencies provide input in this process in hopes of developing a sensible easily implemented rule. Transportation agencies should also be involved in the decision to opt into transitional ozone nonattainment.

In 2000 and 2003 USEPA and state governors will be designating nonattainment areas for ozone and PM_{2.5} respectively. Because of the significant effect on transportation agencies they should be involved in the designation process.

Transportation agencies should be as active as possible in development of emissions inventories and control strategies. Accurate inventories and projections are critical in development of appropriate control strategies. It is far easier to discuss what are appropriate strategies during their development than to try and change them at the eleventh hour immediately before or after USEPA approval.

Transportation agencies should also participate strongly in development of interagency consultation procedures and state conformity rule development. The interagency consultation procedures work to ensure communications between the agencies. The state conformity rule defines the framework in which state and locally funded projects will be considered.

Conclusion

Once again the world is changing for transportation agencies. Practitioners of

transportation planning need to look not only to the act of the play but to the act beyond that as well. We also need to utilize the lessons that we have learned at so much cost in the past few years.

First transportation agencies must develop in house expertise on significant new problems. In most cases, particularly at state DOT level, it is no longer acceptable for Air quality related policy issues to be handled on a part time basis or as a collateral duty. Second transportation agencies should develop lines of communications with state and local Air agencies. The goal is to become active participants in the SIP development process. Being an active participant requires more than simply providing information upon request. There is a significant opportunity for transportation agencies to improve their positions in the development of the interagency consultation SIPs that must be revised as a result of the Third set of conformity amendments. Third, transportation agencies need to learn from one another. Fourth transportation agencies should work to resolve the SIP Plan mismatch. Fifth, transportation agencies need to look ahead and develop policy analyses and policy positions on these issues.